



December 3, 2019

Mary Nichols, Chair California Air Resources Board  
1001 I Street Sacramento, CA 95814

**RE: Support for a Stronger Advanced Clean Trucks Rule**

Dear Chair Nichols and Members of the Board:

On behalf of over 15,000 members of the International Brotherhood of Electrical Workers throughout San Diego, Imperial and Los Angeles Counties and more than 350 NECA San Diego and Los Angeles electrical contractors, we join community, environmental justice, public health partners and fellow labor unions in urging the California Air Resource Board (CARB) to strengthen the proposed Advanced Clean Truck Rule. As currently crafted, it is inadequate and too weak to make a real difference in meeting our climate goals and protecting public health. For example, as pointed out by the Union of Concerned Scientists, under the proposed rule only 4% of trucks by 2030 would be zero-emission. We believe the draft proposal falls far short on both what is possible and needed and urge CARB to strengthen the proposal by:

- (1) Increasing the overall mandates to ensure that by 2030 no less than 15 percent of medium and heavy-duty trucks on the road are zero-emitting;
- (2) Including Class 2b pickup trucks in the mandates beginning in 2024;
- (3) Outlining CARB's longer-term objectives for achieving 100 percent zero-emission trucks in various categories, and explaining how this phase of the rule is consistent with those objectives and attaining federal and state air quality and greenhouse gas objectives; and
- (4) Committing to adopt corresponding fleet purchase requirements in 2021.

In 2011, California passed what was then viewed as one of the most ambitious renewable energy policies of its time, the 33% by 2020 renewable portfolio standard. Today, less than ten years later, not only have the state's clean energy requirements been vastly expanded to 100% renewable and carbon-free energy by 2045 but as PV Magazine reported in April, just for a moment, California was running on **93% clean electricity**.<sup>i</sup> This historic buildout of new renewable energy generation created millions of hours of union construction work. Moreover, through economies of scale, it dramatically decreased technology costs which continue to fall.<sup>ii</sup>

This incredible milestone was achieved thanks to vision, bold leadership and smart policy. The same can happen for transportation, which as we know, represents 41% of greenhouse gas emissions in California. As we also know, tackling transportation pollution is vital to achieving our climate goals and creating cleaner, healthier air, especially in environmental justice communities who have long borne the brunt of deadly diesel pollution and particulate matter. As stated in SB 350 The Clean Energy and Pollution Reduction Act of 2015, “reducing emissions of greenhouse gases to 40 percent below 1990 levels by 2030 and to 80 percent below 1990 levels by 2050 **will require** widespread transportation electrification.”

Electrifying trucks also has the potential to generate high-quality jobs, skilled training opportunities and new investments in California’s economy. For example, statewide training initiatives like the Electric Vehicle Infrastructure Training Program are preparing California electricians for the shift to clean transportation technologies. In fact, IBEW electricians have already installed charging infrastructure for medium-duty electric trucks in Southern California.

We are at a critical moment in history. With each passing day we are seeing the devastating effects of climate change on working families. Additionally, as the American Lung Association noted in their recent “State of the Air” report, California has some of the most polluted air in the nation. If we are to avert the worst impacts of a climate disaster and improve air quality, we need strong and aggressive action to reduce pollution from these vehicles. With a stronger Advanced Clean Trucks rule that includes the provisions outlined above, CARB can continue California’s trailblazing leadership on climate change while delivering a win-win-win for public health, workers and our economy. We urge you to strengthen the rule to include these crucial requirements.

Sincerely,

Jeremy Abrams  
Business Manager, IBEW, Local Union 569

Joel Barton,  
Business Manager, IBEW, Local Union 11

Andy Berg  
Executive Director, NECA San Diego Chapter

Jim Willson,  
Chapter Manager, National Electrical Contractors Association

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<sup>i</sup> <https://pv-magazine-usa.com/2019/04/15/californias-solar-power-record-setting-season-is-here/>

<sup>ii</sup> <https://www.forbes.com/sites/jamesellsmoor/2019/06/15/renewable-energy-is-now-the-cheapest-option-even-without-subsidies/#127c898e5a6b>